



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

EPA Region 5 Records Ctr.



314021

REPLY TO THE ATTENTION OF: SR-6J

VIA ELECTRONIC MAIL AND USPS

October 31, 2007

Jennifer Hale
Environment Health & Safety, WTC 2G2
P.O. Box 9777
Federal Way, WA 98063-9777

RE: Plainwell Mill, Operable Unit #7, Allied Paper/Portage Creek/Kalamazoo River Site
Plainwell Mill Banks Emergency Action
Response to Weyerhaeuser October 25, 2007 Letter

Dear Ms. Hale:

As you know, the United States Environmental Protection Agency (U.S. EPA) provided comments on the draft *Plainwell Mill Banks Emergency Action Design Report* (DR) to Weyerhaeuser in a letter dated October 10, 2007. By letter dated October 16, 2007, Weyerhaeuser responded to U.S. EPA's comments. The U.S. EPA identified concerns regarding the adequacy of Weyerhaeuser's responses during phone calls on October 18 and 25, 2007. In a letter dated October 25, 2007, Weyerhaeuser provided revised responses, and at that time requested: (1) conditional approval of the revised DR; (2) formal written approval of the addended *Multi-Area Quality Assurance Project Plan* (QAPP) and *Multi-Area Field Sampling Plan* (FSP); and (3) acknowledgement of receipt of the final *Health and Safety Plan* (HASP).

The U.S. EPA is conditionally approving the DR, with final approval pending U.S. EPA's receipt of a finalized version of the DR that incorporates the revisions proposed in Weyerhaeuser's letters of October 16 and 25, 2007. Additionally, U.S. EPA is approving the addended FSP, and acknowledges receipt of the final HASP.

The U.S. EPA is also approving the addended QAPP, although U.S. EPA continues to have serious reservations about Weyerhaeuser's proposal to use RMT -- Weyerhaeuser's general contractor for this project -- to validate/verify data generated by Weyerhaeuser's laboratory. U.S. EPA strongly recommends that an independent third party (*i.e.* a party unrelated to either RMT or Weyerhaeuser) be used for data validation/verification. You should be aware that, if Weyerhaeuser continues to insist on using RMT as its data validator, U.S. EPA will consider contracting with an independent data validator as part of its oversight of this project.

Thank you for your attention to this matter. Please do not hesitate to call me at 312.886.1434, should you have any questions related to the project.

Sincerely,

A handwritten signature in black ink, appearing to be 'SC' with a long horizontal flourish extending to the right.

Sam Chummar, Remedial Project Manager
U.S. EPA Region 5
Superfund Division – Remedial Response Branch #1
77 W Jackson Blvd. (SR-6J)
Chicago, IL 60604

cc: Eileen Furey, C-14J
James Saric, SR-6J
Michael Berkoff, SR-6J
Paul Bucholtz, MDEQ